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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products Liability
 Litigation

No. MD-15-02641-PHX-DGC

LISA HYDE and MARK HYDE, a
 married couple,

Plaintiff,

v.

C.R. BARD, INC., a New Jersey
 corporation and BARD PERIPHERAL
 VASCULAR, an Arizona corporation,

Defendants.

**PLAINTIFFS' PROPOSED VERDICT
 FORM**

(Assigned to the Honorable David G.
 Campbell)

In accordance with the Court's Order dated July 13, 2018 (Doc. 11872), Plaintiffs
 hereby submit their proposed Verdict Form (Reference Verdict Form WI-JI-CIVIL
 3290.1).

We, the jury empaneled and sworn in the above action, upon our oaths, find as
 follows:

A. LIABILITY

I. Strict Product Liability Design Defect Claim (Reference WI JI-CIVIL 3260.1)

1 1. When the Filter left the control of the Bard Defendants and reached Ms. Hyde,
2 was it in such a defective condition as to be unreasonably dangerous to Ms. Hyde?

3 _____Yes _____No
4

5 2. If you answered “yes” to Question No. 1, then answer this question. Otherwise
6 do not answer it. Was the defective condition a cause of the injury?

7 _____Yes _____No
8

9 II. Negligent Design and Testing (Reference WI JI-CIVIL 3240).

10 3. Were the Bard Defendants negligent in the design or testing of the filter?

11 _____Yes _____No
12

13 4. If you answered “yes” to Question No. 3, then answer this question. Otherwise
14 do not answer it. Was the negligence a cause of the injury?

15 _____Yes _____No
16

17 B. DAMAGES-(Reference WI JI_CIVIL 1700,1750.1)
18

19 You must answer the following damage questions no matter how you answered any
20 of the previous questions in the verdict. The amount of damages, if any, found by you
21 should in no way be influenced by how answered any previous questions in the verdict.

22 5. Did Mr. Hyde sustain a loss of consortium?

23 _____Yes _____No
24

25 6. What sum of money will fairly and reasonably compensate the Plaintiffs with
26 respect to:

27 (a) Past health care expenses? \$_____

28 (b) Future health care expenses? \$_____

(c) Past pain, suffering and disability? \$_____

(d) Future pain, suffering and disability? \$_____

(e) Loss of consortium \$_____

C. PUNITIVE DAMAGES (Reference WI JI_CIVIL 1707.2)

7. Did the Bard Defendants act maliciously toward Ms. Hyde or in an intentional disregard of the rights of Ms. Hyde?

_____ Yes _____ No

If you answered the previous question “yes”, answer this question:

8. What sum, if any, do you award against the Bard defendants as punitive damages?

Answer: \$_____

Presiding Juror Number

Date

RESPECTFULLY SUBMITTED this 26th day of September, 2018.

GALLAGHER & KENNEDY, P.A.

By: /s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of September, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine